



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
HATTIESBURG DIVISION

MERVIN ANDREWS, JR., ET AL.

PLAINTIFFS

v.

CIVIL ACTION NO.: 2:03CV293

CLARK SAND COMPANY, ET AL.

DEFENDANTS

DESIGNATION OF EXPERT
WITNESSES BY PEARL/JAMES JOINT VENTURE

Defendant, Pearl/James Joint Venture, through undersigned counsel, submits the following list of expert witnesses whom it may call at trial of the captioned case:

1. **Mike Cashio, Industrial Hygienist**
S & ME, Inc.
9751 Southern Pine Boulevard
Charlotte, NC 28273
2. **Dr. William D. Frazier**
Jackson Lung Clinic
1151 North State Street, Suite 304
Jackson, Mississippi 39202
3. **Gerald Martin Goldhaber, Ph. D.**
Goldhaber Research Associates, LLC
The Aston
800 6th Avenue, Suite 26G
New York, NY 10001
4. Defendant further designates all experts designated by any other party, including those of all co-defendants, even if said co-defendant is dismissed prior to trial.

5. Defendant reserves the right to call any past or present treating or examining physicians and/or other health care providers of the plaintiffs, as well as past or present co-workers, supervisors, or any other job or exposure-site witnesses.

6. Defendant reserves the right to supplement this designation as discovery is ongoing in this case and, further, necessary medical, product information and exposure information have not been provided by the plaintiffs.

7. Defendant reserves the right to withdraw the designation of any expert and to re-designate said expert as a consulting expert.

This listing is preliminary. Discovery is ongoing. Defendant reserves the right to supplement and/or amend this listing.

Respectfully submitted, this, the 1ST day of February, 2005.

PEARL/JAMES JOINT VENTURE



JEREMY D. HAWK

A handwritten signature in black ink, appearing to read "J. Hawk". It is written in a cursive style with a large, stylized initial 'J' and 'H'. Below the signature, the name "JEREMY D. HAWK" is printed in a smaller, sans-serif font.

OF COUNSEL:

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Jeremy D. Hawk (MSB# 101189)
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CERTIFICATE OF SERVICE

I, one of the counsel of record for **DEFENDANT, PEARL/JAMES JOINT VENTURE**, do hereby certify that I have this date caused to be delivered, via **United States Mail, postage prepaid**, a true and correct copy of the above and foregoing document to:

**Alwyn H. Luckey, Esquire
Steven Mullins, Esquire
2016 Bienville Blvd.
Ocean Springs, MS 39564**

**W. Harvey Barton, Esquire
Skip Edward Lynch, Esquire
Barton and Williams, P. A.
3007 Magnolia Street
Pascagoula, MS 39567**

All other known counsel of record

THIS the 15 day of February, 2005.



JEREMY D. HAWK